

1 ANTHONY L. HALL, ESQ.
Nevada Bar No. 5977
2 ahall@hollandhart.com
PETER D. NAVARRO, ESQ.
3 Nevada Bar No. 10168
pdnavarro@hollandhart.com
4 HOLLAND & HART LLP
5441 Kietzke Lane, Second Floor
5 Reno, Nevada 89511
Telephone: (775) 327-3000; Fax: (775) 786-6179

6 *Attorneys for Defendants*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 CAMERON E. OLIVER, individually and on
10 behalf of others similarly situated,

11 Plaintiff,

12 v.

13 BELL TRANS, a Nevada Corporation, and
14 BRENT J. BELL,

15 Defendants.

CASE NO.: 2:16-cv-00305-JAD-PAL

**STIPULATION TO STAY ALL
PROCEEDINGS FOR**

(Second Request)

16 Plaintiff Cameron Oliver ("Plaintiff"), by and through his counsel of record, and Defendants
17 Bell Trans and Brent Bell ("Defendants"), by and through their counsel of record, submit the
18 below stipulation to stay all proceeding in the above captioned matter. The purpose of this stay is
19 to allow the parties to engage in meaningful settlement discussions in an effort to fully and finally
20 resolve this dispute. Since the parties' prior request to stay was granted, their negotiations have
21 resulted in an agreement to jointly mediate this case with a related case (also before this Court) in
22 an effort to reach a global resolution as to both matters. For these reasons, the parties now
23 respectfully request additional time to allow for the analysis of wage and hour data in these related
24 matters so that they will not be required to duplicate costs and efforts by mediating both matters
25 separately.

26 The parties therefore stipulate and agree that:

27 1. The above captioned dispute shall be stayed for a period of 72 days commencing on
28 August 12, 2016, and ending October 23, 2016 (the "Stay Period");

1 2. The Stay Period is calculated to allow this matter to be stayed so that it can be
2 meditated at the same time as the parties mediate a related class/collective action matter that is also
3 presently before this Court, Case No. 2:15-cv-01066-MMD-PAL, *Willie Thurmond v. Presidential*
4 *Limousine* (“Thurmond Matter”). A stipulation to stay all proceedings in that matter until October
5 23, 2016, was recently granted by the Court on July 29, 2016.

6 3. Since the last stay ordered by the Court in this matter, the parties have worked to
7 identify a list of putative class members in this matter. This list was subsequently provided to
8 Plaintiff, and Plaintiff selected 10% of the individuals on the list for which Plaintiff would need
9 detailed wage and hour information in order to prepare for mediation. Defendants began
10 compiling this information but had difficulty exporting the data from Defendants’ information
11 systems into a searchable format that would allow Plaintiff to efficiently analyze the data. Once
12 Defendants were finally able to export the data, a review of the information (conducted in
13 preparation for production) revealed that a systemic error had occurred when Defendants
14 attempted to export the data in bulk. That error resulted in inaccurate and incomplete data results.
15 Thereafter, Defendants set to re-compile the requested data. While repeating this process was
16 arduous and time-consuming, it was necessary in order to provide Plaintiff with complete and
17 accurate information. Accordingly, the parties respectfully request additional time to now allow
18 Plaintiff a meaningful opportunity to analyze Defendants’ data prior to mediation.

19 4. If the parties do not resolve this dispute during the Stay Period and do not request
20 an additional stay from the Court to continue settlement negotiations, the parties agree to jointly
21 submit within seven calendar days after the end of the Stay Period: (1) a new Discovery Plan and
22 Scheduling Order; and (2) a briefing schedule for purposes of responding to Defendants’ pending
23 motions (Docket Nos. 7 and 8).

5. The forgoing request for stay is made in good faith to enable the parties to engage in meaningful settlement dialogue and not for the purpose of delay.

DATED this 19th day of August, 2016.

BY: /s/ Dana Sniegocki, Esq.
 LEON GREENBERG, ESQ.
 NV Bar No. 8094
 leongreenberg@overtimelaw.com
 DANA SNIEGOCKI, ESQ.
 NV Bar No. 11715
 dana@overtimelaw.com
 LEON GREENBERG PROFESSIONAL CORPORATION
 2965 South Jones Blvd – Suite E3
 Las Vegas, Nevada 89146
 Telephone: (702) 383-6085
 Fax: (702) 385-1827

Attorneys for Plaintiff

BY: /s/ Peter D. Navarro, Esq.
 ANTHONY L. HALL, ESQ.
 Nevada Bar No. 5977
 ahall@hollandhart.com
 PETER D. NAVARRO, ESQ.
 Nevada Bar No. 10168
 pdnavarro@hollandhart.com
 HOLLAND & HART LLP
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 Reno, Nevada 89511
 Telephone: (775) 327-3000
 Fax: (775) 786-6179

Attorneys for Defendants

IT IS SO ORDERED:


 United States Magistrate Judge

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HOLLAND & HART LLP
 5441 Kietzke Lane, Second Floor
 Reno, NV 89511
 Phone: (775) 327-3000 ♦ Fax: (775) 786-6179